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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VAN CLEEF & ARPELS, S.A., and	07-CV-11476 (SAS)
VAN CLEEF & ARPELS, INC.	
Plaintiffs,	DEFENDANT MOUAWAD USA, INC.'S INITIAL DISCLOSURES

vs.

HEIDI KLUM GmbH and
MOUAWAD USA, INC.

Defendants.

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Defendant Mouawad USA, Inc. ("Mouawad"), by and through its undersigned counsel, hereby submits the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). This statement is submitted without the benefit of complete discovery or initial disclosure statements by Plaintiffs Van Cleef & Arpels, S.A. and Van Cleef & Arpels, Inc. (collectively, "Plaintiffs"), which is making its disclosures simultaneously. Accordingly, Mouawad reserves the right to disclose additional information regarding any of its claims, or to otherwise supplement these

disclosures pursuant to Fed. R. Civ. P. 26(e), following discovery in this action and/or the filing of an initial disclosure statements by Plaintiffs.

I. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION

Without waiving its right to supplement this list of individuals likely to have discoverable information that Mouawad may use to support its claims or defenses, Mouawad lists the following individuals:

1. Pascal Mouawad, President of Mouawad USA, Inc., who may be contacted through his counsel, Hinkhouse Williams Walsh LLP, may have information relevant to the design and creation of the Heidi Klum Clover Collection of jewelry that is at issue in this case (the "Klum Collection"), the advertisement and marketing of the Klum Collection, and sales of the Klum collection.

2. Angelo Todaro, formerly of Mouawad USA, Inc., who may be contacted through their counsel, Hinkhouse Williams Walsh LLP, may have information relevant to the design and creation of the Klum Collection.

3. Shelly Gibbs of Mouawad USA, Inc., who may be contacted through their counsel, Hinkhouse Williams Walsh LLP, may have information relevant to the advertisement and marketing of the Klum Collection.

4. Heidi Klum of Heidi Klum GmbH, who may be contacted through counsel, Alston & Bird LLP, 90 Park Avenue, New York, New York, 10016-1387, may have information relevant to the design and creation of the Klum Collection and the advertisement and marketing of the Klum Collection.

II. DOCUMENTS WHICH DEFENDANTS MAY USE TO SUPPORT THEIR CLAIMS OR DEFENSES

Without waiving their right to supplement the list of documents in their possession, custody, or control that Mouawad may use to support its claims or defenses, and without waiving its right to object to the production of any document subject to any applicable privilege, including, without limitation, documents and information of a confidential or proprietary nature, and/or documents and information protected by the attorney-client privilege and/or the work product doctrine, and/or protected pursuant to F.R.C.P. 26(b)(3) and/or other applicable laws or doctrines which prohibit or otherwise limit discovery, Mouawad discloses the following documents. Pursuant to the entry of an appropriate protective order, these categories of documents, may be available for inspection and copying at Hinkhouse Williams Walsh LLP upon reasonable notice.

1. Invoices, data compilations and other documents relating to revenue, expenses, profit and sales of the Klum Collection.
2. Invoices, data compilations and other documents relating to revenue, expenses, profit and sales of Plaintiffs' various Alhambra jewelry lines.
3. Photographs and images of the Klum Collection.
4. Photographs and images of Plaintiffs' various Alhambra jewelry lines.
5. Photographs and images of other clover jewelry.
6. Documents relating to the design, creation, advertisement and promotion of the Klum Collection.
7. Line sheets relating to the entire line of the Klum Collection.
8. Line sheets relating to the entirety of each of Plaintiffs' various Alhambra lines of jewelry.

10. Documents relating to the frequency of the use of the clover design in the jewelry industry and marketplace.

11. Documents relating to the absence of consumer confusion between Plaintiffs' various Alhambra jewelry lines and the Klum Collection.

III. DESCRIPTION AND COMPUTATION OF DAMAGES

Mouawad does not, at this time, claim any damages against any other party to this matter. Mouawad reserves the right to assert any and all claims against appropriate parties at the appropriate time, however, whether the same be asserted in this or any other or future action.

IV. LIABILITY INSURANCE AGREEMENT

Mouawad identifies Travelers insurance agreements, policy numbers I-680-34F33773-PHX-06 and I-680-34F33773-PHX-07, that may be applicable to this case and will be made available for inspection and copying.

Dated: May 28, 2008

s/John T. Williams

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CERTIFICATE OF SERVICE

I, John T. Williams, hereby certify that on this 28th day of May, 2008, a copy of the foregoing **DEFENDANT MOUAWAD USA, INC'S INITIAL DISCLOSURES** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/John T. Williams